

EXHIBIT J

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF YUNI VASQUEZ

I, Yuni Vasquez, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. At the time of these terrorist attacks, I was a citizen of the Dominican Republic. I later became a United States Citizen in 2008. Attached as Exhibit A to this Declaration is a true and correct copy of my current proof of U.S. citizenship.

3. At the time of the terrorist attacks of September 11, 2001, I worked as a maintenance employee with American Building Maintenance, Inc. (“ABM”). I had only been employed with ABM for one week at the World Trade Center (WTC) when these horrible events occurred. Attached as Exhibit B to this Declaration is a true and correct copy of my proof of employment with ABM at the World Trade Center (WTC) during the time of the 9/11 terrorist attacks.

4. On the morning of September 11th, I had been cleaning windows on the 81st Floor of the South Tower when the first passenger jet, American Airlines Flight 11, plunged into the North Tower. I heard a huge explosion and I turned and saw flames shooting out of the upper section of the North Tower and papers flying everywhere around the building. I advised those around me to evacuate the South Tower.

5. Despite the fact that only the North Tower had been damaged at that point, I decided to evacuate from the South Tower as quickly as possible. I ran towards the emergency exit stairwell to escape from the building. As I entered the stairwell I was surprised to see that the area was well lit and very few people were in the area. However, as I began my descent from the 81st Floor, hundreds of people packed into the stairwell.

6. As I descended the stairs with many others, the lights went out, and people started to panic. Many people pushed and shoved those around me as they tried to quickly descend the stairs to exit from the South Tower.

7. As I descended the stairs in the concrete stairwell, the crowd pushed me from behind, and I fell forward and hit my face and chest on the concrete steps. As I laid face down, people trampled over me and I received additional injuries to my shoulders, back, and legs.

8. Due to my injuries, I had trouble getting back on my feet. A person helped me to my feet, and despite my excruciating pain, I limped down the stairs while holding on to a handrail for support. The crowd of people in the stairwell pushed me a second time, and I fell to the concrete again. My head and body slammed against the concrete, and I suffered further injuries to my head, back, shoulders, and legs.

9. Despite my injuries, I stumbled to my feet and continued to descend the stairs as I was determined to get out of the South Tower. Finally, after an hour of descending the steps in the stairwell, I made it to the Lobby of the South Tower. A firefighter helped me to exit from the building.

10. Once I had arrived on the plaza outside of the South Tower, I had to limp around dead bodies and body parts as I attempted to escape from the WTC area. The scene was horrific and reminded me of a war zone. I continued to limp away from the area until a northbound bus

picked me up and dropped me off at 125th Street. I finally made it home around 4:30 pm on the afternoon of September 11th.

11. Due to my multiple injuries, I sought initial treatment at Metropolitan Hospital Center's Emergency Room shortly after the events of 9/11. In the days, weeks, months, and years after the events of 9/11, I continued to seek medical treatment for my physical and emotional injuries.

12. As a result of these terrorist attacks, I suffered the following specific injuries¹ on September 11, 2001: back injuries with herniated and bulging discs²; a neck injury³; blunt head trauma with a cerebral concussion, cognitive delays, and headaches⁴; bilateral knee and ankle injuries⁵, bilateral shoulder injuries⁶, a chest injury⁷, and temporomandibular joint disorder ("TMJ")⁸. Lastly, my doctors diagnosed me with depression and post-traumatic stress disorder⁹ due to the horrific events that I experienced on 9/11.

13. I sought and continue to seek medical attention for my injuries caused by these terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records confirming my physical and emotional injuries following the September 11, 2001, terrorist attacks.

14. I previously pursued a claim (VCF 212-000563) through the September 11th Victim Compensation Fund (VCF) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

¹ See, 9/11 Injury Records of Yuni Vasquez (VASQUEZ_MEDS_0001), attached hereto as Exhibit C, at 0001-0048.

² *Id.* at 0002-0003, 0005-0007, 0010-0022, 0030, 0032-0037, and 0039-0049.

³ *Id.* at 0010, 0012-0019, 0021-0023, 0030, 0032-0037, 0039-0043, and 0045-0048.

⁴ *Id.* at 0002-0003, 0005, 0010-0023, 0030, and 0047-0048.

⁵ *Id.* at 0010-0013, 0016-0020, 0034-0037, and 0039-0048.

⁶ *Id.* at 0006, 0010, 0012-0014, 0016-0020, 0022, 0030, 0034, 0036-0037, 0039, 0041, 0044, and 0046-0048.

⁷ *Id.* at 0002, 0008, 0010, 00112-0014, 0016-0020, and 0022.

⁸ *Id.* at 0010, 0012-0013, and 0016-0018.

⁹ *Id.* at 0013, 0015, 0018, 0021-0022, 0024-0030, 0038, and 0048.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 21 day of November 2023.

A handwritten signature in black ink, reading "Yuni Vasquez". The signature is written in a cursive style with a large initial "Y" and a stylized "V".

Declarant Yuni Vasquez

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**